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12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 SAN FRANCISCO DIVISION

15 NATIONAL TPS ALLIANCE, *et al.*,

16 Plaintiff,

17 v.

18 KRISTI NOEM, in her official capacity as
19 Secretary of Homeland Security, *et al.*,

20 Defendants.
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Case No. 3:25-cv-1766

**DEFENDANTS' NOTICE OF PROPOSED
SEARCH TERMS, CUSTODIANS, AND DATES
Re: ECF No. 364**

28 DEFS.' DEFENDANTS' NOTICE OF PROPOSED SEARCH TERMS, CUSTODIANS, AND DATES
[RE: ECF No. 364]– No. 3:25-cv-1766

On January 15, 2026 at or around 11:28am Pacific Time, Plaintiffs filed a Joint Discovery Letter Brief with the Court to which they appended Exhibit B, a Summary of Proposals Regarding Custodians, Dates and Search Terms. ECF No. 364, 364-2. This joint filing did not attach Defendants' most up-to-date summary of proposals.

Defendants write to notify the Court that they provided additional counter-proposals to Plaintiffs while the Parties worked to draft the Joint Discovery Letter. The most current version of Defendants' counter-proposals, including some additional stipulations as to custodians for RFP Set One, are appended to this Notice for the Court's consideration.

Dated: January 15, 2026

Respectfully submitted,

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[RE: ECF No. 364]– No. 3:25-cv-1766

Email: Eric.M.Snyderman@usdoj.gov

Attorneys for the Defendants

CERTIFICATE OF SERVICE

I hereby certify that on January 15, 2026, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

/s/ Eric M. Snyderman
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